

Humphreys, Mary - CSREES/Partnerships

From: Praxis [praxis@allegan.net]
Sent: Friday, September 14, 2001 9:36 AM
To: mhumphreys@reeusda.gov
Cc: senator@stabenow.senate.gov; senator@levin.senate.gov; kimleval@qwest.net; pschwab@reeusda.gov

Subject: Public comment CSREES Listening Sessions - Round 2, for Oct. 3 Fresno California.

Dear Ms. Mary Humphreys, Please load this entire document as public comment for the CREES listening session for the Federal Register.

Regarding extensive and pervasive conflicts of interest and land grant university-land grant university extension repression and disparagement of pesticide alternatives and alternative agriculture by CSREES funded institutions. This is a formal request to end all funding and to disband CSREES and Individual state extension agencies. We sincerely believe that you are part of the problem and not part of the solution. This action should be taken to support the common good.

Sincerely,

Patrick D. McKown

Samuel M. DeFazio

Jean E. McKown Praxis.

Below is one example of an on-going problem with CSREES funded programs.

----- Original Message -----

From: Praxis
To: armstroj@msu.edu
Cc: WyantD9@state.mi.us ; pbirkho@house.state.mi.us ; email@allegannews.com ; cparker5@ix.netcom.com ; bird@msue.msu.edu ; senator@stabenow.gov
Sent: Wednesday, September 12, 2001 10:12 AM
Subject: Pesticide free schools in Michigan and Pesticide Alternatives.

Dear Mr. Armstrong, Dean MSU Agriculture and Natural Resources,

Please consider this a formal complaint and request for policy and behavioral change of MSU and MSU Extension. In our opinion despite supportive lip service there has been a general failure to support authentic IPM and EBPM programs and a careful and sustained disparagement of non-pesticide alternatives in the State of Michigan .

Praxis is the Integrated Biological Cybernetics company based in West Michigan that provides solutions for pest and environmental management based on biology rather than chemistry. Both as a business concerned for the embryonic biological control industry, and as citizens, we have grave concerns as to why so many sources of IPM information fail to identify non-pesticide, readily commercially available biological control IPM alternatives. Pesticide use, and the use of GMO's is promoted and endorsed by default if available natural biological control alternatives are not identified by school, community, and farm IPM specialists on a state and local level, as it is by MSU, MSU Extension, and by some employees of State of Michigan Agencies such as MDA.

MSU's false claims of official "Life form efficacy testing" policy and offers of our Biotool Kit Products -

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"biological control organism testing policy" sent to us in your organizations many written responses to our concerns are of grave concern to us. We have discovered after years of stonewalling on the part of university officials that MSU/MSUE has no identifiable force of law or publicly funded mission for this posture. Your official or implied authority and behavior is in our opinion not acceptable and contrary to your written and enunciated mission statement. The influence of MSU/MSU actual behavior with some elected officials, extension and state employee personnel should concern every American citizen, it is nothing like a democratic free market economy but more like socialism or state capitalism where purchasing decisions for pest and environmental management products and services are strongly encouraged by university, extension, or state government employees, making them *not* a free choice or unbiased posture. Praxis has repeatedly identified long standing glaring conflicts of interest with the behavior of at least some MSU and MSU Extension personnel and our own work, and your employee's interference with our clients contracts. Written agreements of understanding between MSU/MSUE and Praxis have not been honored. For confirmation of this fact call Stephan McKown, Ortman, Tooman, Hale, and McKown, & Kiel @ 616-673-2136. Based on behavior and observation over a period of years we view MSU/MSUE as a competing business. MSU/MSUE is seeking and presently receiving funding and seeking more public and private grants and "partnerships" by with other Praxis competitors. This is especially disturbing to us while the repression and disparagement of our commercially available Praxis Biotool Kit products for food and fiber IPM, school IPM, animal management, waste management, and the marketing of value added Michigan agricultural products has been so aggressively, and effectively accomplished by the people you steward. Here is some information about school IPM in Michigan. Please add our information to your list of available resources.

It is the opinion of Praxis, as a family farm, the senior partner an American veteran that at least some MSU and MSU Extension is coopted and have historically played a special role in the disparagement, repression, and overt and covert interference with bringing effective affordable non-pesticide products on line in Michigan, some of them available for more than a decade while school children in Michigan, and woman of child bearing years remain at special and avoidable risk from pesticides.

The September issue 2001 of Audubon magazine on pg. 26 has an article about the students at Lewis Cass Technical High School in Detroit. The students trained here by Praxis in Allegan Michigan using our materials and methods are now according to the facilities management staff of the Detroit Public Schools outperforming their own and professional pesticide PCO's, and School IPM analyst for the EPA calls our product at Cass Tech, our Academy Biotool Kit product "fantastic". Simply put in Allegan County Michigan there is a 100% failure to meet the legal written verifiable School IPM- MDA Regulation requirement ten years after going in to place why?. This school IPM Failure is matched pretty closely state wide, why is that? Why is MSU/MSU Extension, MDA, and EPA and the students identified in a Detroit Free press article as the source or our proprietary CIB and proprietary materials and methods for Cass Tech's school IPM when that is not factual?

Please obtain a copy of the article discuss this issue with Dr. Gorge Bird 517-353-3890 in your entomology department who is familiar with our concerns and let know what you think ASAP.

Praxis, meeting IPM and Ecologically Based Pest Management (EBPM) requirements presents the New Academy Biotool Kit™ Pesticide Free Schools: buildings, grounds, playing fields, food service areas, new construction based on Integrated Biological Cybernetics™.

By Patrick D. McKown, Samuel M. De Fazio and Jean E. McKown

Twelve years ago, Allegan Public Schools, in Allegan Michigan became the first school district in the nation to completely eliminate pesticide use due to insecticide resistance of the cockroach population present in favor of a new broader more effective environmental management strategy based on biology rather than chemistry, called Integrated Biological Cybernetics™ (IBC) our award winning proprietary innovation.

Praxis's site specific approach is based on sound scientific principals such as sanitation, mechanical barriers, micro-habitat modification, the predator-prey relationship, parasitoids, entomopathogenic diseases, accurate identification of the pest index, knowledge of their life cycles and constant and diligent monitoring. Meeting or exceeding the requirements for authentic IPM as called for in the Michigan Department of Agriculture's exemplary school IPM regulations *and* Ecologically Based Pest Management (ECBM) as recommended by the National Academy of Sciences as "New Solutions for a New Century". All

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environmental management challenges on a wide variety of issues and pests including, Cockroaches, Termites, Filth and Biting Flies, Ants, Wasps, Moth & Drain flies, Gypsy Moth, Mosquitoes, moldy carpets, etc. have been successfully met. Reducing the risk of vectoring diseases, allergic responses, and envenomation. Embracing not just the letter but also the intent of the State of Michigan regulations, to take students, staff and visitors out of harms way. It is important to recognize IBC™ is a process, not an event.

Pesticide use reduction is 100%. Praxis is of the opinion, based on our observations and experience that the use of pesticides pose an insurmountable barrier to long term, cost effective, environmentally sound, pest management. Representing special and avoidable risks to children and women. These biocides remain as an available option, we do not use them because like Cockroach allergens, pesticides and their "inert" carriers pose a constellation of health concerns and can act as a trigger in Asthma cascades leading to mortality and morbidity. Lack of knowledge regarding pesticide half lives inside human habitations constitute an identifiable risk to health and human safety not only in a "Sick Schools" context but also how the residual toxins effect beneficial organisms that might need to be employed as part of an authentic IPM program. Praxis uses no genetically modified organisms (GMO'S) as part of any Biotoool Kit™.

Site Specific New Academy Biotoool Kit™ Development Praxis has no "canned" or "one size fits all approach" what we do during the consultation phase of the kit, is to gather information we need from our potential client to make our Biotoool Kits™ effective at every individual location. We charge a set fee for this consultation. When the consultation is completed we quote a cost that has all material, shipping, and technical support costs imbedded to manage the site for a period of about one year. If the cost is acceptable to our client they pay us and we begin shipping inanimate supplies. Living material is sent, usually by UPS in a sequential fashion as required to manage the problem. Site visits are not necessary Praxis has successfully implemented different Biotoool Kits™ products (list enclosed) in more than twenty eight (28) states remotely. Because the living component are genetically preprogrammed and are essentially self- applying nearly anyone can be an effective steward of a New Academy Biotoool Kit™. No certification or notification is required in Michigan to set out sticky traps or to release a beneficial organisms.

Costs of a New Academy Biotoool Kit™ in the maintenance phase run from 20% less than to 80% less than conventional contracted pesticide spraying services. The cost of the program at Cass Technical High School is less than \$0.05 per student per day, we feel most parents, school boards, and teachers unions would support that expense for a pest and pesticide free public school campus, and playing fields. This approach also increases building security by using existing staff or students. If a human child or a woman can be considered a non-target organism then security on a metabolic level is increased because pesticide use invariably constitutes a violation on a cellular level when toxic active ingredients or toxic "inert" molecules enters the body by inhalation or touch, without permission or consent.

Before the New Academy Biotoool Kit™ was advanced to multiple locations our materials and methods were reviewed by The Centers for Disease Control (CDC), US Environmental Protection Agency (EPA), United States Department of Agriculture APHIS, USDA/Insects Effecting Man Laboratory Gainesville, FL. The pre-market approval division of the Food and Drug Administration (FDA), Michigan Department of Public Health (MDPH), Michigan Department of Agriculture (MDA), Allegan County Public Health Department, Allegan County Intermediate School District, Allegan School District Board, and the Parent Teachers Association (PTA) . The final decision after several years of the larger review process was that there were no identifiable risks to health and human safety with our approach using these biological control life forms in human habitations. Separately, at the request of our elected officials a multi-organizational task force of academicians, agency representatives, and elected officials decided after site visits, much discussion, debate, and review to allow our product to advance. Praxis has a letter from the State of Michigan Department of Public Health director to that effect. We are broadly supported in what we do by the people of the conservative midwestern community that we live in.

Bioremediation and competitive exclusion extends our ability to denature Cockroach allergens, frass and shed exoskeleton, accumulating over time persists as a lung irritant for many years as well as semiochemicals and aggregation pheromones, that are not eliminated by conventional cleaning methods. This helps to lower the incidence of distress to Asthma suffers. The competitive exclusion of harmful molds, Cladosporium, Stachybotrys, Aspergillus, etc. mean that major contributors to "sick building syndrome" are managed not by creating an environment too toxic for them to grow in, but by stealing their resources from tiles, floors, drains, and carpets where they grow. Cumulative pesticide residues can be bioremediated in situ by a consortia of microorganisms as an accommodation for Multiply Chemical Sensitive individuals, regardless if they are students or staff, meeting the mandates of the Federal Americans with Disabilities Act. Praxis has won special

recognition for its authentic IPM work from several sources including Michigan Environmental Health Association (MEHA) and the presidents council on sustainable development.

Cass Technical High School is one school that has taken full advantage of the significant educational component imbedded in all Biotoool Kit™ products. Students have done an outstanding job and are working to maximize the New Academy Biotoool Kit™ potential at their school. Some students have had the opportunity to earn community service credit towards graduation by volunteering time to managing a Biotoool Kit™ in their community. Hospitals, day care centers, elder care facilities, and low income housing, offices, are all benefitting. The public driven to frustration by Cockroach pesticide resistance issues will encourage tragedies, like the illegal misuse of Methyl Parathion in Michigan, and several nearby states, requiring an 18 million dollar cleanup, to happen again. The need for information on pesticide alternatives is vital, an urgent need not meet by existing sources, such as some land grant university extension, and some state agencies despite clearly identified public interest.

For more information, or to answer questions contact us. Visit our web page, <http://www.praxis-ibc.com>, or email us praxis@allegan.net.

Patrick D. McKown

Samuel M. DeFazio

Jean E. McKown

Praxis

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Allegan, MI 49010

Phone/fax 616-673-2793

USA

Praxis Product List. Effective, Sustainable, Affordable, Environmental Management Alternatives: Biotoool Kits TM. Since 1986 Environmental Management Without Chemical Biocides.

Human Habitation

New Academy Biotoool Kit" (Human Habitation) Pesticide free school buildings and grounds. The Academy Biotoool Kit" is consistent with State of Michigan IPM regulations and Michigan Department of Agriculture School IPM program.

Doma Biotoool Kit" (Human Habitation) Pesticide free homes, apartments, offices and public buildings, consistent with GSA mandates, new construction pretreatment, and complies with State of Michigan IPM rules and regulations. Also the voluntary accommodation of chemically handicapped Americans; MCS sufferers Biological control of pest insects.

Café Biotoool Kit" (Human Habitation). Pest and pesticide free restaurants, Michigan Department of Public Health approved for use in food service areas.

Janus Biotoool Kit" (Human Habitation) Pesticide free prisons, jails, custom

houses and police settings, eliminating the availability of pesticides for use as weapons and agents of suicide. Increases staff and inmate safety, security and complies with Government Services Administration, Integrated Pest Management mandates. Biological control of pesticide resistant insects.

Molina Biotool Kit" (Human Habitation and Food Stream) Pesticide free stored grain elevators and warehouses of stored organic products, Grocery stores, biological control of stored grain insects and cockroaches. A biological evolved systems approach to pest management.

Waste Stream

Anam Biotool Kit" (Waste stream & Environmental Poisons) Bioremediation of pesticides, hydrocarbon toxins, petroleum products, industrial waste streams, brown fields. Expedites the transition to organic farming.

Swine Biotool Kit" (Waste Stream & Forage) Pesticide free fly and odor control, waste treatment and storage lagoons for swine, reduce non-point pollution.

Cast Biotool Kit" (Waste Stream) Waste water treatment plants microbial argumentation and bioremediation, improves compliance with DEQ and reduces odor.

Cowpens Biotool Kit" (Waste stream & Forage) Pesticide free bovine fly and odor management. Meadow management, reduce non-point pollution.

Epona Biotool Kit" (Waste Stream & Forage) Pesticide free biological control of flies and odor. Equine settings, large animal veterinary practices, riding, boarding, and breeding stables. The Epona Biotool Kit" emphasizes reducing conflicts between the urban/suburban interface, addressing Right to Farm, rezoning conflicts, and nuisance law suits associated with keeping horses.

Loch Biotool Kit" (Waste Stream & Water Quality) Pesticide and herbicide free lake management. ponds, biological control of aquatic vegetation and mosquitoes.

Phase Biotool Kit" (Waste Stream Recovery) Pesticide free leaf and yard waste management, composting, odor control, bioremediation, biological control of associated pests directed to community based efforts. Small communities without specialized equipment can compost their own yard waste. This low input static pile method can support community based gardening, teaching gardens, or park maintenance.

Viren Biotool Kit" (Waste Stream). Pesticide free golf courses , parks, turf, biological management of turf pests and turf diseases by competitive exclusion.

Zoon Biotool Kit" (Waste stream & Closed System Animal Habitats) Pesticide free zoos, public aquariums, pet stores, nature centers and wildlife sanctuaries were pesticide use is impractical, not desirable, or prohibited. Biological control is effective and economical alternative.

Vegetable Crops & Fruit Production

Directed to Growers who want to eliminate pesticides, herbicides, fungicides from their management production systems. Visit our web site, call, or write us biological growing alternatives for vegetable, grain and fruit crops. Biological control of major and minor crop pests, reduce non-point pollution and groundwater contamination. The Food Quality Protection Act (FQPA) encourages all pest management strategies that are consistent with pesticide use reduction to lower the risk to children and women who are more easily harmed by these toxic products.

Allium Biotool Kit" (Agriculture) Onions, all varieties.
Asparagus Biotool Kit" (Agriculture) Asparagus.
Avalon Biotool Kit" (Agriculture) Apple orchards.
BleumenKel". Bioponically" grown cut flowers.
Brassica Biotool Kit" (Agriculture). Cabbages. All varieties.
Capsicum Biotool Kit"Peppers.
Cichorium Biotool Kit" Endives.
Cucumis Biotool Kit" Cucumbers.
Cucurbita Biotool Kit"Squashes.
Daucus Biotool Kit"Carrots.
Fragaria Biotool Kit" Strawberries.
Helianthus Biotool Kit". Sunflowers.
Ipomoea Biotool Kit" Sweet potatoes.
Lactuca Biotool Kit" Lettuces.
Niche Biotool Kit" (Horticulture). Field container grown nursery stock. Covers multiple varieties and species of trees and shrubs.
Orchid Biotool Kit" (Horticulture). Orchids, wild, ornamental and cut flower.
Phaseolus Biotool Kit" (Agriculture). Green beans.
Rubus Biotool Kit" (Agriculture) Raspberries. Black and Red.
Solana Biotool Kit" (Agriculture). Potatoes, tomatoes, egg plant and other solanaceous vegetables.
Soya Biotool Kit" (Agriculture). Soybeans.
Spinachia Biotool Kit"Spinach.
Vaccinium Biotool Kit" (Agriculture). Blueberries. Cranberries.
Vectus Biotool Kit" (Environmental). Mosquito and Black Fly.
Viren Biotool Kit" (Environmental). Parks, turf, golfcourses.
Vitis Biotool Kit" (Agriculture). Grapes. Eating and wine.
Zea Biotool Kit" (Agriculture). Sweet Corn.

From Our Landscape Ecology Research

HedgeMaster Biotool Kit" (Agriculture). Increasing plant diversity for sequential nectar and pollen availability in perimeters results in increased natural animal diversity in urban, suburban, and agricultural settings. Hedgemaster" is used in the perimeter of areas with crop production in agricultural Biotool Kits" to support the biological components of the programs. It is a real time degree day schedule for biological applications and pest events and it gives opportunity for farmers or horticulturalists to increase the worth of their land and provide a reservoir for beneficial plants and organisms off crop cycle to assist in further agricultural diversification and production. Developed from more than twenty years of observation of landscape ecology with plant insect interactions.

New Grange Microfarm" is selecting plants with special talents and relationships

to be distributed through garden centers and landscapers as well as for farm perimeters.

Greenhouse Biotoool Kit" (Crops) Pesticide free, beyond organic starter plants, from public, rehabilitation, teaching and production greenhouses, building atriums, greenhouses conservatories, are kept free from environmental biocides, addresses EPA reentry requirements and record keeping, non point pollution and worker safety. A 100% reduction in pesticide, fungicide, acaricide, nematocide, avicide, molluskicide and herbicide use.

Specific Problems

Dispar Biotoool Kit" (Gypsy Moth) Pesticide free Community Based Gypsy Moth Control. Implemented by, schools, townships, cities, neighborhood organizations, business patrons or individuals. Affordable, easily implemented, long term management. Can be started any time from early spring until late fall.

Rute Biotoool Kit" (Japanese Beetle) Pesticide free Japanese beetle control, parks, golf courses, arboreta, airports and other turf surfaces.

Medusa Ant" (Carpenter Ant, and other species) Pesticide free Carpenter Ant control. Our material and methods have ended problems that had persisted for years using pesticides.

Vectus Biotoool Kit" (Biting Insects). Mosquito, Black Fly and other biting flies control, of medical and veterinary importance.

Vespa Biotoool Kit" Yellow Jackets. Fairgrounds, schools, parks, waterfronts, greengrocers, wineries.

Medusa Cockroach"Cockroaches(all species

IPM Definition:

Integrated Pest Management (IPM) is a pest management strategy that focuses on long term prevention or suppression of pest problems with a minimum impact on human health, the environment, and non-target organisms and is based on biological control.

Praxis Rationale for Reliance on Biological Controls as the Primary Control Methods

From USDA, APHIS, NBCI (National Biological Control Institute), Dr. Ernest S. Delfosse, Ph.D.,
Director: Re:Biological control,

"It is the first option for pest management, and replaces chemical control as the, base strategy of Integrated Pest Management".

USDA, EPA, FDA, Tripart Agreement to reduce pesticide use and protect children.(pesticide use reduction 100%)

National Research Council's Pesticides in the Diets of Infants and Children. 1993. This book and study identifies children as being at higher risk than adults from pesticide exposure.

The National PTA's and National Education Associations position on pesticide reduction and health and human safety- in school settings.

The FDA's final determination was that there are no identifiable risks to health and human safety from our materials and methods.

Our **Ecologically Based Pest Management** approach (In all of our Biotoool-Kits™) is consistent with the recommendations of the National Academy of Science. All of our Biotoool-Kit™ products are based on peer reviewed scientific literature. All of our Biotoool-Kits™ are our own invention and our closely held intellectual property.

Special recognition for Praxis and its School IPM Biological Control program, The Academy Biotoool-Kit™.

*Praxis received the Michigan Environmental Health Award from the Michigan Environmental Health Association given for extraordinary contribution to public health,

*Featured in PTA Today Magazine pesticide-free school

IPM using the Praxis Academy Biotoool-Kit™.

*Praxis received a Keep Michigan Beautiful Award for pesticide free school IPM.

*Lewis Cass Technical High School 1st student run IPM.

*Praxis received recognition from the Presidents

Council on Sustainable Development.

*Praxis was elected to the National Green Products and Service Association and is listed in the National Green Pages, their directory, along with other notable and socially responsible companies such as Ben & Jerrys Ice Cream, Malden Mills makers of Polartec™ and Patagonia outdoor outfitters.

To Contact Us

Please call us between 9:00 am and 5:30 pm Monday through Friday. After hours or on the week end, you can leave a message and we will get back to you as soon as possible. Phone and Fax 616-673-2793. You can also contact us by email at praxis@allegan.net through our web page at <http://www.praxis-ibc.com> for more information

Thank you. We hope that you will be able to join the sounder financial and natural economics of the "Real Green Revolution":-) Remember; all life forms on this planet exist in a pre-approved state and are not subject to "efficacy testing" or "approval" by any state or federal institution, agency or university. They have been "Beta-tested" for at last 2.5 billion years. ©2000, 2001

Academy Biotool-Kit™

School Integrated Pest Management

Conforms with Department of Agriculture School IPM rules and regulations, NEPA, Act 451 of 1994

and Regulation 637 that requires a verifiable IPM Program must in place for each school building.

Pesticide Free IPM

What is IPM? The purpose of authentic "**Integrated Pest Management**" is to manage pests with the least possible impact on people, property, and the environment" (Michigan Department of Agriculture). Praxis meets or exceeds all IPM requirements.

Who needs to comply? Any public K-12 private, charter, parochial schools, and day care operations, all health care facilities, hospitals, nursing homes, and any building that is owned or operated by a federal, state or local government including public universities.

Since 1986 we have offered successful pest management *without the use of cancer causing volatile synthetic chemical pesticides*. Our Academy Biotool-Kit™ can be used by anyone without the special permits and certification required when pesticides are sprayed in public places.

Contact us for information about pesticide test kits for school building and grounds and our IPM verification packet.

Please visit our Academy Biotool Kit™ web page.

http://www.praxis_ibc.com/id30.htm

Safer, Effective, and Economical. A written verifiable School IPM plan has been a requirement for every school in the State of Michigan for more than a decade. The intent of this regulation is clear, to reduce risk from pesticides while keeping pests at low levels. Surprisingly, many Michigan schools have yet to meet this requirement. For over ten years Our School IPM management program has successfully repressed the detrimental effects of all insect pest species for both building and grounds wherever it has been used. The Academy Biotool-Kit™ is based on sound scientific principals such as, sanitation, careful monitoring, mechanical barriers, micro-habitat modification, correct pest identification, the ecology and life cycle of the pest and its parasites, parasitoids, and predators. Praxis encourages the entomophagus diseases specific to cockroach, ants, flies, termites, etc. to manage them and keep them out of our schools. Praxis uses no genetically engineered or modified organisms in any Biotool Kit™. Our proprietary Biotool Kit™ product works all year long and can be started anytime. The effect is a continuous effective addressment of

the pest problem as some of the beneficial organisms in the Biotoool-Kit™ will become resident, as long as there is a pest present and some beneficial organisms will overwinter.

Pesticide: Bigger impacts on smaller bodies.

Why make the change from pesticides to Praxis?

Children are more harshly effected than adults by pesticides. Women and girls are harmed more than men and boys. Pesticide use reduction of toxic volatile's is 100% with our program. Our clients are public and private schools, day care centers, universities and colleges, we provide a personalized consulting service to characterize our clients precise circumstances pest and environmental management needs. We offer a safer alternative to both the synthetic and microbial pesticides that are commonly endorsed and promoted by many public officials and agencies at this time. Once in place the per person cost of our program is *significantly less* than the cost of pesticide based pest suppression programs.

Safe Schools? School violence, asthma, learning disabilities, linked to pesticide use in schools?

It shocking for many parents to learn that some pesticides commonly used in schools have been linked to mind altering effects leading to behavioral problems, reductions in cognitive learning ability, ADHD and ADD like symptoms, depression, and episodes of violent behavior in some students. Asthma rates are climbing and both the skin and droppings of pests like cockroaches and pesticides can trigger asthma cascades leading to increased death rates in school age children based on CDC reports. Pesticides are registered with the EPA because they are not safe. Both the short and long term harm caused by using pesticides near children has been grossly under reported. There is a multitude of negative health effects associated with childhood exposure to pesticides these include but are not limited to nerve damage, persistent anorexia, suspected viral enhancers, mutagens, carcinogens, teratogens, fetotoxins, causing reproductive anomalies, reduced protein synthesis, liver, lung, kidney, thyroid, bladder, spleen, eye, blood damage, sleep disturbances, kills white blood cells, asthma, headaches, dizziness, nausea, hallucinations, tremors, rashes, vomiting, slurred speech, irregular heartbeat, salivation, sweating, rapid eye motions, and convulsions to name a few. Exposure is unavoidable, remarkably even at this late date the EPA says little is know about pesticide "half life" inside of structures. "Accidents" are reported hundreds of times every year. Violations take place on a cellular level without our permission and usually without our knowledge. How can we say that we want safe schools when for reasons described as "public health" we toxify children's classrooms or lunchrooms and then ask students and staff to re-occupy them without even insisting on the re-entry periods we demand of agricultural workers safety for identical pesticide products. Recent research has now shown that it may be reasonable to suggest immunocompromised students may be at special risk.

Pesticides: Not in Our Recipe.

Our Academy Biotoool-Kit™ represents a comprehensive approach. Praxis is of the opinion, based on our observations and experiences that the use of pesticides pose an insurmountable barrier to long term, cost effective, environmentally sound pest management. While pesticides remain an available tool they have proven to be unnecessary for good pest management.

One is the Only Number.

A single Cockroach, is all that Praxis requires as an "action threshold" for our Academy Biotool-Kit™ program. You don't need to wait for heavy infestation to act. Pesticide industry representatives would have you believe that biological control is less effective than pesticides. To that we answer that nothing is immune or grows resistant to being eaten, that is what we do.

With IPM you must wait to reach the "threshold".

No, it is not prudent or even logical to wait for the problem to get larger before you take any action. It is wise to act when the problem is small. This supports anyone's honest assessment of common experiences and falls gently into common sense.

School Security is Improved.

All work is done onsite by existing staff, or students.

Pesticide Risks Are Very Real.

An "objector" is a label placed on parents, staff or students that say they don't want pesticides used in schools. Some public officials claim these people are just being "emotional" or that need to be "educated" and that pesticides are "safe" a common oxymoron.

Integrated Biological Cybernetics™.

Biological control is a grossly underutilized natural resource that should be available to all Americans. It has one of the best economic, environmental, health and safety records of any human enterprise. Praxis meets all requirements for authentic IPM. Integrated Biological Cybernetics™ is the basis for all of Praxis's unique Biotool Kit™ inventions.

IPM shouldn't mean Improved Pesticide Marketing

IPM is *NOT* just announcing when or what pesticides you are going to spray on a predetermined weekly or monthly basis and notifying parents. However, this is what sometimes still passes as an "IPM" plan for some schools. What is happening at your school? One problem is *purposeful* lack of agreement on what "IPM's" means to promote the continued use of toxic pesticides.

Please visit the reference section on our website.

Pesticides in the Diets of Infants and Children.

http://www.praxis_ibc.com/id170.htm

Basic Guide to Pesticides, Their Characteristics and Hazards

http://www.praxis_ibc.com/id172.htm

Our Children's Toxic Legacy. http://www.praxis_ibc.com/id175.htm